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Attorneys for Defendant
CHAE L SONNEN

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSHUA OLDS, an individual

Plaintiffs,

v.

CHAE L SONNEN, an individual; FOUR
SEASONS HOTELS LIMITED, a foreign
corporation; DOES I - V, inclusive; and ROE
ENTITIES VI-X, inclusive,

Defendant.

CASE NO.: 2:23-cv-212-JCM-BNW

**STIPULATION AND ORDER TO
REOPEN CLOSE OF DISCOVERY
DEADLINE**

(FIRST REQUEST)

COMES NOW Defendant CHAE L SONNEN by and through his attorneys of records
JAMES R. OLSON, ESQ. and STEPHANIE ZINNA, ESQ. of OLSON CANNON GORMLEY
& STOBERSKI, and Plaintiff JOSHUA OLDS, by and through his attorney of record
MICHAEL DUFOUR, ESQ. of DUFOUR LAW, P.C. hereby stipulate to reopen the close of
discovery deadline. This is the first stipulation for extension of discovery deadlines.

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I. DISCOVERY COMPLETED

1. The parties have served initial disclosures and supplements thereto.
2. Written discovery has been served and answered.
3. Plaintiff has served his initial expert disclosures.
4. Defendant has requested dates for Plaintiff's deposition but was delayed from this endeavor because of trial as explained below.

II. DISCOVERY REMAINING

1. Written discovery as necessary.
2. Deposition of Plaintiff, dates requested.
3. Deposition of Defendant, dates requested.
4. Depositions of treating providers, if necessary.
5. Deposition of fact witnesses.

III. REASONS WHY DISCOVERY WAS NOT COMPLETED

Discovery was unable to be completed because of defense counsel's trial schedule. On August 2, 2023 counsel was set for a firm three-week trial setting beginning on October 9, 2023 for a complex legal malpractice matter (A-18-768351-C). On September 13, 2023, another trial court set defense counsel for a three-week trial setting to begin on October 16, 2023 (A-21-836817-C). Defense counsel was forced to attempt to prepare for two trials at once, while preparing new attorneys to take over the latter case. Trial for the complex litigation began on October 9, 2023 through October 26, 2023. Defense counsel advised Plaintiff's counsel of the conflict and requested this extension of discovery.

The current close of discovery was November 7, 2023. This request is not made within 21 days of the deadline. Counsel for Defendant has been in trial in Clark County District Court,

1 A-18-768351-C from October 9, 2023 through October 26, 2023. The trial was further
 2 complicated because of a personal emergency of one of the parties. Defense counsel apologizes
 3 for the delay and requests the Court find good cause for the delay.

4 This stipulation was then further delayed due to misunderstanding as to the scope of the
 5 stipulation between counsel. Counsel exchanged several emails clarifying their respective
 6 positions with respect to the requested extension of discovery. Due to this miscommunication,
 7 submission of this stipulation was delayed further.

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 9 **IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY AND**
 10 **AMENDED DISCOVERY PLAN**

11 Counsel requests an extension of discovery through **January 12, 2024** to account for
 12 scheduling difficulties during the holidays.

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 14 a. Discovery Cut-Off Date(s). All discovery must be commenced in time to be completed
 15 by **Friday January 12, 2024**.
 16 b. Amending the Pleadings and Adding Parties. **Closed**.
 17 c. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts). **Closed**.
 18 d. Dispositive Motions. The parties shall have until **Monday, February 12, 2024**, which
 19 is 30 days after the discovery cut-off date in accordance with LR II 26(b)(4).
 20 e. Pretrial Order. The parties shall have until **Wednesday, March 13, 2024** to submit
 21 the joint pretrial order which is 30 days after the dispositive motion deadline.

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Olds v. Sonnen

Stipulation to Reopen Close of Discovery

The disclosures required by Fed. R. Civ. P. 26(a)(3) shall be made in the joint pretrial order. In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision of the dispositive motions or further order of the Court in accordance with LR II 26(b)(5).

DATED this 21st day of November, 2023.

OLSON CANNON GORMLEY & STOBERSKI

/s/ Chael Sonnen

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Attorney for Defendant
CHAEI SONNEN

DATED this 20th day of November, 2023.

~~DUFOUR LAW APC~~

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Nevada Bar No.: 13480

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 11/22/2023